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November 19, 2019

VIA ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: GCI Communication Corp.
Notice of Ex Parte Communication – *Expanding Flexible Use of the 3.7 to 4.2 GHz Band*
GN Docket No. 18-122

Dear Ms. Dortch:

On November 15, 2019, Jessica Gyllstrom of Telecommunications Law Professionals PLLC, on behalf of GCI Communication Corp. (“GCI”), spoke on the phone with Aaron Goldberger, Wireless and International Advisor to Chairman Pai. My representations during this call were consistent with GCI’s previous statements on the record in this docket and in related proceedings.¹

Specifically, I reiterated GCI’s request for the FCC to recognize the unique role that the C-Band plays in Alaskan communications by excluding the State of Alaska from any future reallocation of the C-Band, as well as announcing an end to the C-Band filing freeze in Alaska upon the adoption of such

¹ See, e.g., Letter from Jessica Gyllstrom, Counsel to GCI Communication Corp., to Marlene H. Dortch, Secretary, FCC, GN Docket No. 18-122 (Sept. 3, 2019); Letter from Jessica Gyllstrom, Counsel to GCI Communication Corp., to Marlene H. Dortch, Secretary, FCC, GN Docket No. 18-122 (Aug. 28, 2019); Comments of GCI Communication Corp., GN Docket No. 18-122, RM-11791, RM-11778 (filed Aug. 7, 2019); Letter from Jessica Gyllstrom, Counsel to GCI Communication Corp., to Marlene H. Dortch, Secretary, FCC, GN Docket No. 18-122 (July 18, 2019); Reply Comments of GCI Communication Corp., GN Docket No. 18-122 et al. (filed Nov. 27, 2018); Comments of GCI Communication Corp., GN Docket No. 18-122 et al. (filed Oct. 29, 2018); Comments of GCI Communication Corp., GN Docket No. 18-122 (filed May 31, 2018); Reply Comments of General Communication, Inc., GN Docket No. 17-183 (filed Nov. 15, 2017); Comments of General Communication, Inc., GN Docket No. 17-183 (filed Oct. 2, 2018); Letter from Jessica Gyllstrom, Counsel to General Communication, Inc., to Marlene H. Dortch, Secretary, FCC, in RM-11791 (Sept. 25, 2017); Letter from Michael Lazarus, Counsel to General Communication, Inc., to Marlene H. Dortch, Secretary, FCC, in GN Docket No. 17-183, WT Docket No. 17-79 (Sept. 20 2017); Comments of General Communication, Inc., RM-11791 (Aug. 7, 2017).



decision.² GCI needs the ability to continue to operate and license C-Band earth stations as it did before the C-Band Filing Freeze was announced.³

I also reiterated GCI's requests for the following protections to incumbent C-Band operations: (1) a commitment from the satellite operators to continue to serve Alaska with similar or superior capacity and coverage in Alaska for the foreseeable future, which will be enforced by the FCC; (2) maintenance of the full-band, full-arc coordination policy; and (3) reimbursement to Alaska earth station operators for all costs incurred as a result of the reallocation of the C-Band services, regardless of whether that occurs exclusively in CONUS.

Please direct any questions to the undersigned.

Sincerely,

/s/Jessica D. Gyllstrom

Jessica DeSimone Gyllstrom
of TELECOMMUNICATIONS LAW PROFESSIONALS PLLC

cc (via email): Aaron Goldberger

² *Temporary Freeze on Applications for New or Modified Fixed Satellite Service Earth Stations and Fixed Microwave Stations in the 3.7-4.2 GHz Band*, GN Docket Nos. 17-183, 18-122, Public Notice, DA 18-398 (rel. April 19, 2018) ("C-Band Filing Freeze").

³ See, e.g., *In the Matter of GCI Communication Corp. Request for Waiver of the Temporary Freeze on Applications for New or Modified Fixed Satellite Service Earth Stations in the 3.7-4.2 GHz Band*, IBFS File No. SES-LIC-20180608-01392, Order, DA 19-725, ¶ 6 (IB Aug. 1, 2019).